

JUN 13 1996

DRE-8J

Detrex Corporation Solvents Div.  
12886 Eaton Avenue  
Detroit, Michigan 48227

Re: New Federal Regulations on the  
Import/Export of Hazardous Waste  
Detrex Corporation Solvents Div.  
MID 091 605 972

Dear Sir/Madame:

I have enclosed a photo copy of the April 12, 1996, FEDERAL REGISTER, "Imports and Exports of Hazardous Waste: Implementation of OECD Council Decision, Final Rule." By July 11, 1996, persons involved in importing/exporting hazardous waste must be in compliance with the regulations published in the enclosed requirements which address the control of transfrontier movements of waste destined for recovery operations. These new requirements, promulgated under the authority of the Resource Conservation and Recovery Act as amended (RCRA), apply in all States, irrespective of States' RCRA authorization status.

If you have any questions regarding this Final Rule please contact the RCRA Hot Line 1-800-424-9346 or TDD 1-800-553-7272 (for the hearing impaired). In addition, selected supporting materials are available on the Internet. The April 12, 1996, FEDERAL REGISTER has instructions to access the information electronically.

Sincerely yours,

ORIGINAL SIGNED BY  
UYLAINE E. MCMAHAN

Uylaine E. McMahan  
Compliance Assistance Program Manager  
Enforcement and Compliance Assurance Branch  
Waste, Pesticides and Toxics Division

Enclosure

US EPA RECORDS CENTER REGION 5



1005046

ENVIRONMENTAL PROTECTION AGENCY  
OFFICE OF ENFORCEMENT  
NATIONAL ENFORCEMENT INVESTIGATIONS CENTER  
BUILDING 53, BOX 25227, DENVER FEDERAL CENTER  
DENVER, COLORADO 80225

DATE: July 6, 1990

JUL 09 1990  
or

MEMORANDUM

TO: GLENN STERNARD  
HAZARDOUS WASTE EXPORTS COORDINATOR  
WASTE MANAGEMENT DIVISION  
EPA REGION 5 (5HR-12)

FROM: JIM VINCENT  
COORDINATOR, HAZARDOUS WASTE EXPORTS ENFORCEMENT

SUBJECT: VIOLATIONS OF RCRA EXPORT REGULATIONS - GOLD SHIELD  
SOLVENTS (MID091605972)

In accordance with the EPA Enforcement Strategy for Hazardous Waste Exports, I am attaching information on non-compliance with export regulations by the subject company for your review and appropriate enforcement action.

A computer evaluation of data in the NEIC EXPORT database has identified the subject company as not in compliance with regulations requiring the submission of an annual report to EPA for exports of hazardous waste to Canada in 1989. The company is a new exporter that initially exported in October 1989.

Attached are a summary of information in the NEIC EXPORT database, the Notification of Intent to export, the EPA Acknowledgment of Consent and three 1989 export manifests received from Customs at Port Huron, Michigan. As indicated by the summary, Gold Shield is a frequent exporter with shipments continuing in 1990.

Please contact me at FTS 776-5120 if you have any questions.

Attachments:

04/25/90

ALPHABETICAL LISTING OF WASTE EXPORTERS AND A LISTING OF THE INTENDED AND ACTUAL WASTE QUANTITIES, BY DOT SHIPPING NAME  
 FROM LETTERS OF INTENT AND MANIFESTS -----BASED ON LETTER OF INTENT DATES: 01/01/89 THROUGH 12/31/89  
 \*\*\*\*\*

EXPORT WASTE GENERATOR

EPA ID NUMBER

(G=GALLONS / P=POUNDS / T=TONS / Y=CUBIC YARDS)  
 (L=LITERS / K=KILOGRAMS / M=METRIC TONS / N=CUBIC METERS)

GOLD SHIELD SOLVENTS

MID091605972 ✓

NOTIFICATION LETTER INFORMATION		MANIFEST INFORMATION		ANNUAL REPORT INFORMATION	
0	10/30/89 UN1710 F002 WASTE TRICHLOROETHYLENE	6.050	G	0	
0	11/24/89 UN1710 F002 WASTE TRICHLOROETHYLENE	5.000	G	0	
04/28/89 UN1710 F002 WASTE TRICHLOROETHYLENE WASTE WATER CONTAINING TRICHLOROETHYLENE	780,000 G 10/18/89 UN1710 F002 WASTE TRICHLOROETHYLENE	0	P	0	



CFR 40 - PART 262.50  
INTERNATIONAL SHIPMENTS

# 468/89

Date: 4-28-89

Office of International Activities (A-106)  
E.P.A., 401 M. Street S.W.  
Washington, D.C. 20460

Attention: Notification to Export

Our facility (exporter) name: Gold Shield Solvents Division of Detrex Corp.  
Address: 12886 Eaton Ave. Detroit, Michigan 48227  
Phone: (313) 491 4550 E.P.A. #: MID 091605972

intends to use (Consignee) name: Tricil (Sarnia) Limited  
Address: RR#1 Telfer Side Road Corunna, Ont. N0N1G0  
E.P.A. I.D. #: MIT 270019904 (519) 864-1021

to dispose of the following hazardous waste for the 12 month period beginning on the date that Canada expresses no objection. The waste involved is:

Description of Waste	EPA Hazardous Waste No.	DOT Shipping Name	Hazardous Class	I.D. # (UN/NA)
Waste Water	F002	Waste Water Containing Trichloroethylene	OEM-A	UN 1710

Frequency: 3 X 5000 gal shipment(s) per week  
(number) (volume & units) (day/week/quarter/year)

Estimated total quantity of hazardous waste shipped for the 12-month period is:  
780,000 U.S. Gallons  
(Units/U.S. Gals/Cu. Yds./Lbs./Tons)

The point of entry into Canada will be: Sarnia Ontario  
City Province  
The point of departure from U.S. will be: Port Huron Michigan  
City State

Each shipment of hazardous waste will be transported by: Tricil (Sarnia) Limited/  
Chemical Services/Gold Shield Solvents/ EPA Transporter No.: MIT 270019904/ILD 980701106  
K & D Industrial Services MID 091605972/ MID 980794770  
Via: Highway in Tank  
(Mode/Air/Highway/Rail/Water) (Drums/Boxes/Tank/Bulk)

The waste listed above will be disposed of in the following manner:  
(eg: Incineration/Land Disposal/Recycling) and conforms to the appended  
Ontario Ministry of the Environment, Acknowledgement of Subject Waste  
Registration, Schedule A.

Exporter Ronald E. Swan Jr. Ronald E. Swan Jr. Branch Manager 4-28-89  
Representative (Type Name) (Signature) (Title) (Date)

c.c. M.A. LaRocque, Tricil (Sarnia) Limited, 265 N. Front St., Suite 502,  
Sarnia, Ontario N7T 7X1

Provincial M.O.E. Waste Class: 282 H  
(3 D i g i t s -- 1 L e t t e r)

0265K/1

SCHEDULE "A"

This attached Schedule forms part of the acknowledgement of generator registration for the facility and site identified by Generator Registration Number MID091605972, dated at Toronto, APR 13 1989

Waste Stream	Waste Class
1. Water containing heavy metals, solvents, and low levels of halogens	282H

Waste Management Branch Reviewer: \_\_\_\_\_

K. H. Jun



**GOLD SHIELD SOLVENTS**  
*Division of Detrex Corporation*

12886 EATON AVE., DETROIT, MICHIGAN 48227

Telephone  
(313) 491-4550

Office of International Activities (A-106)  
E.P.A., 401 M. Street S.W.  
Washington, D.C. 20460

Re: Gold Shield Solvents - Division Detrex Corporation

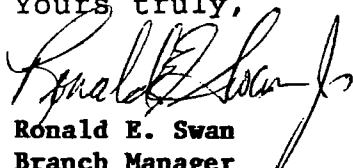
With regard to our bulk shipments of waste material identified as Ontario Waste Class 282H, we would expect that they will be comprised of varying mixtures of the following waste classes:

211, 212, 213, 221, 222, 232, 241, 254, 266, 268, 270

Shipments classed as 282H will not contain any pesticides, herbicides, or polychlorinated biphenyls.

We trust that this letter meets the requirements of the Ontario Ministry of the Environment, and will allow us to commence bulk shipments of class 282H from our facility located at 12886 Eaton Avenue, Detroit, Michigan.

Yours truly,

  
Ronald E. Swan  
Branch Manager  
Gold Shield Solvents

MAR 27 1990

5HR-12

Mr. Ronald E. Swan, Jr.  
Gold Shield Solvents  
12886 Eaton Ave.  
Detroit, Michigan 48227

Re: Import of Hazardous Waste  
from a Foreign Source  
EPA ID No.: MID 091 605 972

Dear Mr. Swan:

Your facility has previously notified the Regional Administrator that you have arranged for the receipt of hazardous waste from a foreign source, pursuant to the requirements of 40 CFR 264.12(a) or 40 CFR 265.12(a) (or the equivalent State requirement), as applicable. The purpose of this letter is to clarify when such notices are to be submitted and to provide a suggested format for such notifications.

The above-cited regulations require the submission of a written notice to the Regional Administrator four weeks prior to the date when a hazardous waste is first received from a specific foreign source. Subsequent shipments of the same waste from the same foreign source do not require additional notifications. The Federal requirements do not require notification for the receipt of non-hazardous waste. (Please note that State regulations may require notification for wastes not specified as hazardous waste under Federal regulation.) Finally, notifications may be submitted for multiple foreign sources and/or wastes.

Although a format for these notifications has not been specified in the regulations, we have enclosed a suggested format, which you may find to be of assistance.

If you should have any questions or comments regarding this matter, please contact Glenn Sternard, of my staff. His telephone number is (312) 886-4582.

Sincerely yours,

William E. Muno, Chief  
RCRA Enforcement Branch

Enclosure

AP 3/23/90

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	GS/brll 3/23/90		for WEM 3/23/90



**\*SUGGESTED FORMAT\***

**DATE**

Regional Administrator  
United States Environmental Protection Agency  
Region V  
230 South Dearborn Street  
Chicago, Illinois 60604

Re: Notification of Intent to  
Import Hazardous Waste  
EPA ID No.: XXX 000 000 000

Dear Sir:

Pursuant to the requirements of 40 CFR 265.12(a)\*\* YOUR FACILITY'S NAME is providing notice that arrangements have been made for the receipt of the following hazardous waste(s) from the following foreign source(s):

FOREIGN SOURCE:  
LOCATION ADDRESS:

Waste Name and Description:

EPA Hazardous Waste No(s):

(repeat for multiple sources and/or wastes)

This notification is being submitted at least four weeks in advance of the date the waste is expected to arrive at this facility.

Sincerely yours,

**FACILITY REPRESENTATIVE**

**\*\*USE 40 CFR 265.12, 40 CFR 264.12 OR STATE CITE, AS APPROPRIATE FOR YOUR FACILITY'S RCRA STATUS AND THE STATE WHERE FACILITY IS LOCATED.**

DETREX CORPORATION  
Solvents Division

12886 Eaton Ave.  
DETROIT, MI 48227



FAX: (313) 491-8044

January 4, 1990

TELEPHONE:  
(313) 491-4550

Regional Administrator  
United States Environmental  
Protection Agency Region V  
230 South Dearborn Street  
Chicago, Illinois 60604

Re: Exception Report for  
Caldendar year 1990

Dear Sir:

Pursuant to the requirements of 40 CFR 262.55 for primary exporters of hazardous waste, I am submitting the following Exception Report for exported hazardous waste shipment (s) returned to the United States.

Exporter: Gold Shield Solvents Division of Detrex Corporation  
12886 Eaton Avenue  
Detroit, Mi 48227  
MID 091605972

Calender Year: 1990

Consignee: Tricil (Sarnia) Limited  
R R #1.  
Corunna, Ont. NON 1C0  
MIT 270019904

Waste Description: Waste Water Containing Trichloroethylene

EPA Hazardous Waste Number: F002

DOT Hazardous class: ORM-A

Transporter: Tricil (Sarnia) Limited MIT 270019904

Total Amount of Waste Shipped: 4,500 Gallons

Number of Shipments: 1

Shipment Information:

<u>Manifest Number</u>	<u>Date</u>	<u>Volume of Shipments</u>
MI 1652323	3-02-90	4,500 Gallons

Date Returned to Exporter: 3-06-90

RECEIVED  
JAN 9 1991  
OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

Page 2

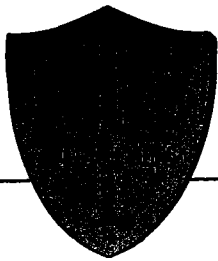
U.S. Environmental Protection Agency  
Exception Report

I certify under penalty of law that I have personally examined and am familiar with the information submitted to this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.



Ronald Hritzkowin  
Facility Manager  
Detrex Corporation Solvents Div.

cc: Dr. Benedict Okwumabua - MI DNR  
Mr. I. H. Shamiyeh - Detrex  
Mr. M. J. Tepatti - Detrex  
Mr. R. E. Swan, Jr. - Detrex  
Mr. J. E. Calderoni - Detrex



**GOLD SHIELD SOLVENTS**  
*Division of Detrex Corporation*

12886 EATON AVE., DETROIT, MICHIGAN 48227  
TELEPHONE: 313/491-4550 FAX: 313/491-8044

May 17, 1989

**RECEIVED**  
MAY 26 1989  
OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

U. S. E.P.A.  
Region-Administrator  
230 S. Dearborn  
Chicago, Illinois 60604

Attention: Glen Sternard

Dear Mr. Sternard,

As per your request in a recent telephone conversation, we are pleased to offer the following:

As required by 40 CFR 265.12, we offer the following information as consignee in order to import waste chlorinated and fluorinated solvents for recycling into the U.S. from a foreign source.

Source/Generator  
AWK Industrial Coating  
47 Sass Road  
Chatham, Ont N7M5J4  
ON 0021200

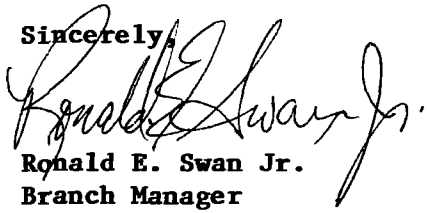
Consignee/T.S.D.F.  
Gold Shield Solvents  
12886 Eaton Ave.  
Detroit, Mich. 48227  
MID 091605972  
Phone No. (313) 491-4550

Description of Hazardous Waste: F001 containing Trichloroethylene U.S. DOT shipping name: Trichloroethylene (UN 1710). The abovementioned waste may be received at the facility at the maximum rate of 10-55gallon drums/week in containers. The wastes may be entering the U.S. at Port Huron/Sarnia or the Detroit/Windsor borders via highway in containers (drums). Once received at the facility, the wastes may be stored in either bulk tank or drums. The waste will be recycled with the overhead products offered for sale commercially. Still bottoms from the recycling operation are incinerated in a rotary cement kiln.

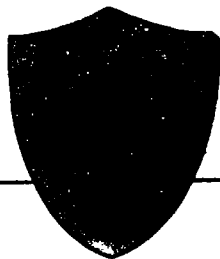
The name and site address of the generator and U.S. consignee are listed above. At this time there is no alternate consignee. The wastes will not be in transit through any other country other than Canada and the U.S.

If you have any questions or there are any deficiencies with this notification of Intent to Import, please feel free to contact me at your convenience.

Sincerely,

  
Ronald E. Swan Jr.  
Branch Manager

cc: C. U. Guy - Detrex, I. H. Shamiyeh - Detrex,  
M. J. Tepatti - Detrex, Michael A. La Rocque - Tricil (Sarnia) Ltd.



# GOLD SHIELD SOLVENTS

## Division of Detrex Corporation

12886 EATON AVE., DETROIT, MICHIGAN 48227  
TELEPHONE: 313/491-4550 FAX: 313/491-8044

March 29, 1989

Office of International Activities (A-106)  
United State Environmental Protection Agency  
401 M Street, S.W.  
Washington, D.C. 20460

Dear Sirs,

As required by 40 CFR 262.53, we offer the following information as consignee in order to import waste chlorinated and fluoronated solvents for recycling into the U.S.

Exporter: AWK Industrial Coating  
47 Sass Road  
Chatham, Ont N7M5J4  
Ontario Generator # ON 0021200

Consignee: Gold Shield Solvents Div. of Detrex Corporation  
12886 Eaton Avenue  
Detroit, Michigan 48227  
MID 091605972  
Phone 1-313-491-4550

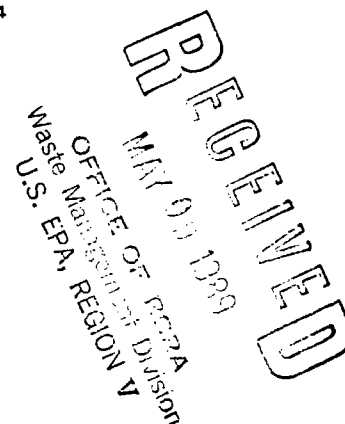
Description of Hazardous Waste: F001 and F002 containing one or more of the following: Tetrachloroethylene, Trichloroethylene, Methylene Chloride, 1,1,1 Trichloroethane, Carbon Tetrachloride, Chlorinated Fluorocarbons (including 1,1,2 Trichloro-1,2,2 Trifluoroethane). Chlorobenzene, Ortho-dichlorobenzene, Trichlorofluoromethane, and 1,1,2 Trichloroethane.

U.S. DOT Shipping name: One or more of the following: Tetrachloroethylene (UN 1897), Trichloroethylene (UN 1710), Methylene Chloride (UN 1593), 1,1,1 Trichloroethane (UN 2831), Carbon Tetrachloride (UN 1846), Trichlorotrifluoroethane (UN 9189), Chlorobenzene (UN 1134), Ortho-dichlorobenzene (UN 1591), Trichlorofluoromethane (UN 1022), 1,1,2 Trichloroethane (UN 2831).

The abovementioned waste may be received at the facility at the maximum rate of 5,000 gallons/week in bulk or 88-55 Gallon drums/week in containers.

The wastes may be entering the U.S. at Port Huron/Sarnia or the Detroit/Windsor borders via highway in either bulk tank truck or containers (drums).

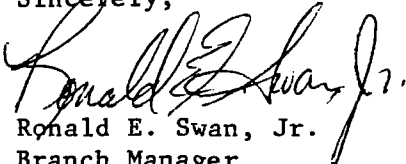
Once received at the facility the wastes may be stored in either bulk tanks or drums. The wastes will be recycled with the overhead products offered for sale commercially. Still bottoms from the recycled operation are incinerated in a rotary cement kiln.



The name and site address of the consignee are listed above. At this time there is no other alternate consignee. The waste will not be in transit through any other country other than Canada and the U.S.

If you have any questions or there are any deficiencies with this notification of Intent to Export, please feel free to contact me at your earliest convenience.

Sincerely,

  
Ronald E. Swan, Jr.  
Branch Manager  
Gold Shield Solvents

cc: C. U. Guy - Detrex  
I. H. Shamiyeh - Detrex  
M. J. Tepatti - Detrex  
Michael LaRocque - Tricil

# CONVERSATION RECORD

TIME

DATE

*pm*

*5/11/89*

TYPE

☐ VISIT

☐ CONFERENCE

☒ TELEPHONE

☐ INCOMING

☒ OUTGOING

ROUTING

NAME/SYMBOL INT

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

*Ronald Swan*

ORGANIZATION (Office, dept., bureau, etc.)

*Gold Shield / Detrex*

TELEPHONE NO:

*(313) 491-4550*

SUBJECT

*Import notice*

SUMMARY

*Regarding the attached notification I spoke w/ R. Swan of Detrex. Apparently they misread the regulation and thought that 262.53 requirement applied to imports. I explained the import requirement to him and requested that he revise his submission citing 265.12 notes for TSD's. I also mentioned that the foreign generator should be notifying Environment Canada and also issue compliance with Ontario provincial regulations.*

*Mr Swan will submit the revised notice to the R.A.*

ACTION REQUIRED

*none*

NAME OF PERSON DOCUMENTING CONVERSATION

*Glen J. Steward*

SIGNATURE

*Glen J. Steward*

DATE

*5/12/89*

ACTION TAKEN

SIGNATURE

TITLE

DATE



# DETREX CORPORATION

## Solvents Division

12886 Eaton Ave.  
DETROIT, MI 48227

FAX: (313) 491-8044

TELEPHONE:  
(313) 491-4550

U.S.E.P.A. Office of International Activities  
401 M. Street S. W.  
Washington, DC. 20460

Dear Sir or Madaam,

As required of primary exporters of hazardous waste as specified in 40 CFR 262.56, I am submitting the following Annual Report of exported shipments of hazardous waste:

Exporter: Gold Shield Solvents Division of Detrex Corporation  
12886 Eaton Avenue  
Detroit, Mi 48227  
MID 091605972

Calender Year: 1989

Consignee: Tricil (Sarnia) Limited  
R R #1.  
Corunna, Ont. NON 1G0  
MIT 270019904

Waste Description: Waste Water Containing Trichloroethylene

EPA Hazardous Waste Number: F002

DOT Hazardous class: ORM-A

Transporter: Tricil (Sarnia) Limited MIT 270019904

Total Amount of Waste Shipped: 34,750 Gallons

Number of Shipments: 6

Shipment Information:

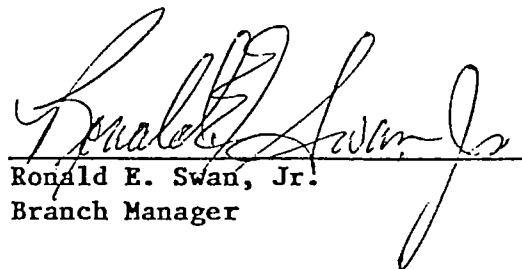
<u>Manifest Number</u>	<u>Date</u>	<u>Volume of Shipments</u>
MI 1652368	10-18-89	7,500 Gallons
MI 1652388	10-27-89	6,000 Gallons
MI 1652389	10-30-89	6,050 Gallons
MI 1652376	11-17-89	3,500 Gallons
MI 1652377	11-24-89	5,000 Gallons
MI 1652440	12-08-89	6,700 Gallons



Page 2

U.S.E.P.A.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.



Ronald E. Swan, Jr.  
Branch Manager

cc: RCRA Enforcement Branch (5HR-12)- U.S.E.P.A.

Mr. Nicholas Bollo - U.S.E.P.A.

Mr. Glenn Sternard - U.S.E.P.A.

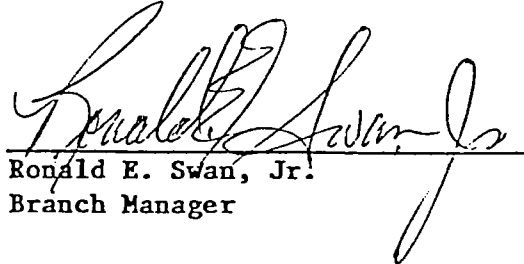
Dr. Benedict Okwumabua - MI DNR

Mr. I. H. Shamiyeh - Detrex

Mr. M. J. Tepatti - Detrex

Page 2,  
U.S.E.P.A.

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Ronald E. Swan, Jr.  
Branch Manager

cc: RCRA Enforcement Branch (5HR-12)- U.S.E.P.A.  
Mr. Nicholas Bollo - U.S.E.P.A.  
Mr. Glenn Stern ~~and~~ - U.S.E.P.A.  
Dr. Benedict Okwumabua - MI DNR  
Mr. I. H. Shamiyeh - Detrex  
Mr. M. J. Tepatti - Detrex

# DETREX CORPORATION

## Solvents Division

12886 Eaton Ave.  
DETROIT, MI 48227



FAX: (313) 491-8044

TELEPHONE:  
(313) 491-4550

U.S.E.P.A. Office of International Activities  
401 M. Street S. W.  
Washington, DC. 20460

Dear Sir or Madaam,

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Exporter: Gold Shield Solvents Division of Detrex Corporation  
12886 Eaton Avenue  
Detroit, Mi 48227  
MID-091605972

Calender Year:

Consignee: Tricil (Sarnia) Limited  
R R #1  
Corunna, Ont. NON 1G0  
MIT 270019904

Waste Description: Waste Water Containing Trichloroethylene

EPA Hazardous Waste Number: F002

DOT Hazardous class: ORM-A

Transporter: Tricil (Sarnia) Limited MIT 270019904

Total Amount of Waste Shipped: 34,750 Gallons

Number of Shipments: 6

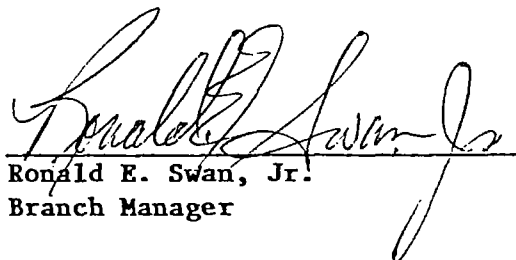
Shipment Information:

<u>Manifest Number</u>	<u>Date</u>	<u>Volume of Shipments</u>
MI 1652368	10-18-89	7,500 Gallons
MI 1652388	10-27-89	6,000 Gallons
MI 1652389	10-30-89	6,050 Gallons
MI 1652376	11-17-89	3,500 Gallons
MI 1652377	11-24-89	5,000 Gallons
MI 1652440	12-08-89	6,700 Gallons

RECEIVED  
OCT 10 1990  
OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
U.S. E. P. A. REGION V

Page 2  
U.S.E.P.A.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

  
Ronald E. Swan, Jr.  
Branch Manager

cc: RCRA Enforcement Branch (5HR-12)- U.S.E.P.A.  
Mr. Nicholas Bollo - U.S.E.P.A.  
Mr. Glenn Sternard - U.S.E.P.A.  
Dr. Benedict Okwumabua - MI DNR  
Mr. I. H. Shamiyeh - Detrex  
Mr. M. J. Tepatti - Detrex